

STATE OF COLORADO
HAZARDOUS MATERIALS WASTE MANAGEMENT DIVISION
COMMENTS ON
HEALTH AND SAFETY PROGRAM PLAN and
HEALTH AND SAFETY PLAN WORKBOOK
November 12, 1990

General Comments:

The overall minimum requirements for a site wide health and safety plan are covered by the revised health and safety plan contained in the above documents. The Environmental Restoration group passed up a splendid opportunity to decrease the future work load of creating the numerous site specific health and safety plans required in the IAG.

Section 6.2 Chemical Hazards

This section could have been fleshed out with much more information, which would have made it easier to write site specific health and safety plans.

Section 6.3 Radiological Hazards

All radionuclides emit alpha, beta or gamma radiation or some combination of the three. Each of the six radionuclides listed should have the type of radiation characteristically associated with it stated. Each of the three types of radiation has characteristic health risks associated with it, either chronic or acute. The information presented is barely minimal and one additional page of data would have saved alot of future work in writing site specific health and safety plans.

Section 6.4 Monitoring Program

The sentence in the last paragraph at the bottom of page 6-7 reads in part "Each respective instrument detects different types of radiation, e.g. alpha, beta, gamma, etc....." Is the author aware of a fourth type of radiation the scientific community is not? The instrument list should have had the type of radiation it counts listed with it.

Appendix B

The inclusion of the material safety data sheets (MSDS) is a step in the right direction. Unfortunately, many of the chemicals present at the plant and listed in Section 1.6 The Summary of Major Contaminants, do not have associated material safety data sheets in Appendix B. All of the contaminants listed in Section 1.6 should have a MSDS in Appendix B. It would have been a relatively simple matter to expand the MSDS's for each of the chemicals present by including material which covered safe handling, chronic exposure risks and symptoms, and monitoring instrumentation and methods. This information is readily available in IRIS and other similar hazardous material and risk assessment data bases. In the preparation of future site and phase specific health and safety plans it would have been easy to pull the expanded MSDS sheets and have a significant portion of the work completed.